

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
(EASTERN DIVISION)

Docket No. 05-CV-10464PBS

TIMOTHY M. BROWDER,
Plaintiff

v.

NATIONAL FINANCIAL SYSTEMS,
INC.,
Defendant

JOINT MOTION TO EXTEND TIME FOR FILING
MOTION FOR SETTLEMENT APPROVAL

The parties request that this Court extend until June 30, 2006 the time for them to file their Joint Motion for Settlement Approval. The matter was settled in mediation with Magistrate Judge Neiman on May 11 and the Court ordered a Joint Motion to be filed within 30 days. Although drafts of the necessary papers have been prepared and exchanged and revised, the parties reasonably believe that final versions will not be completed and executed for filing until late June. Accordingly, they seek another three weeks to complete the process.

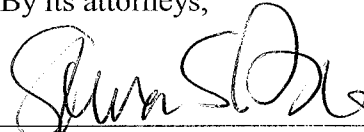
WHEREFORE, the parties seek the Court's endorsement on their proposal to file the Joint Motion for Settlement Approval on or before June 30, 2006.

TIMOTHY M. BROWDER,
By him attorney,



Daniel A. Edelman, Esquire
Edelman, Combs, Lattuner & Goodwin, LLC
120 S. LaSalle Street, 18th Floor
Chicago, IL 60603-3403
312-739-4200
dedelman@edcombs.com

**NATIONAL FINANCIAL SYSTEMS,
INC.,**
By its attorneys,



Steven S. Broadley, BBO #542305
Posternak Blankstein & Lund, LLP
Prudential Tower
800 Boylston Street, 33rd Floor
Boston, MA 02199-8004
617-973-6100
sbroadley@pbl.com

Pro Hac Vice

Albert E. Fowerbaugh, Jr., BBO #6201219
Michael G. Salemi, BBO #6279741
Lord, Bissell & Brook LLP
115 South LaSalle Street
Chicago, IL 60603
Tel: 312-443-0323 (M. Salemi)
Fax: 312-896-6323 (M. Salemi)

CERTIFICATE OF SERVICE

I, Steven S. Broadley, Esquire of Posternak, Blankstein & Lund, LLP, hereby certify that on this 9 day of June, 2006, I caused a copy of the above **Joint Motion to Extend Time for Filing Motion for Settlement Approval** to be mailed to:

Francis R. Greene, Esquire
Daniel A. Edelman, Esquire
Edelman, Combs, Lattuner & Goodwin, LLC
120 S. LaSalle Street, 18th Floor
Chicago, IL 60603-3403

Christopher M. Lefebvre, Esquire
Law Offices of Claude Lefebvre & Sons
Two Dexter Street
Pawtucket, RI 02860

Albert E. Fowerbaugh, Jr., Esquire
Michael G. Salemi, Esquire
Lord, Bissell & Brook LLP
115 South LaSalle Street
Chicago, IL 60603



Steven S. Broadley